

EXHIBIT D

AFFIDAVIT OF KENNETH MASTERS

I, KENNETH MASTERS, affirm as follows:

1. I am over the age of 18, and I am a resident of the Commonwealth of Virginia. I am employed by Patriot Group International ("PGI") as an Operations Coordinator. As such I have personal knowledge of the matters stated in this affidavit, and if called as a witness I would competently testify thereto.

2. PGI has a Master Subcontract Agreement ("MSA") with EOD Technology, Inc., now Janus Global Operations, LLC ("Janus") under the terms of which PGI, as the Prime Contractor ("Prime") would retain Janus to perform certain professional services as a subcontractor in furtherance of the performance of a contract ("the Project") with the U.S. Government.

3. As Operations Coordinator of the Project, I am the primary point of contact and responsibility on the Project for coordinating logistics, lodging, travel and a number of other organizational and planning matters.

4. In or about May of 2016, Randy Leonard ("Leonard") approached me and informed me that the Project was going up for re-bid, and that there was no way that PGI was going to win the re-bid.

5. During that conversation, and/or in additional conversations thereafter, Leonard stated that I was extremely valuable to Project, and that Janus would hire me to do the same job when Janus is awarded the bid on the Project. I viewed these statements as an effort by Leonard to recruit me to work for Janus.

6. During that conversation, and/or in additional conversations thereafter, Leonard stated that I was extremely valuable to Project, Leonard stated that the Project would "fail" if I

quit, and intimated that would be the best way to ensure that PGI did not win the re-bid of the Project.

7. In or about June of 2016, Leonard asked me for my personal e-mail address, which I provided to him.

8. On or about June 28, 2016, Leonard sent me a "test" e-mail from his personal e-mail address to my personal e-mail address. The June 28-30,2016 e-mail chain referenced herein is attached as **Exhibit A** to this Affidavit.

9. On or about June 30, 2016, Leonard sent me an e-mail from his personal e-mail address to my personal e-mail address stating the following:

Kenny,

Close hold between us please. Send me all recruiting documentation that we currently use (all letters / questionnaire etc...)

Thanks man

10. Leonard's use of the term "close hold between us please" meant that he did not want me to disclose this request of his to anyone else. He wanted me to keep it secret. That fact, combined with the fact that he wanted to arrange the transfer of confidential PGI recruiting documents to his personal e-mail lead me to believe that this request was being made for an improper purpose.

11. On or about July 8, 2016, Leonard called me and asked why I hadn't sent him PGI's recruiting documentation yet. He stated that he wanted me to send him the documents as word documents, not as .pdfs.

13. There is no legitimate business reason for me to send these confidential PGI documents, especially in a readily editable form, to Leonard at his personal e-mail address.

13. On or about July 13, 2016, Leonard e-mailed me asking me to send him the contact list for all contractors working on the Project.

14. That list of the individuals working on the Project is sensitive and confidential PGI information.

15. There is no legitimate business reason for me to send that confidential PGI information to Leonard at his personal e-mail address.

I solemnly affirm under penalties of perjury under the laws of the United States of America that the foregoing Affidavit is true and correct.

Executed this 15 day of July 2016, at 1532.



KENNETH MASTERS

EXHIBIT A

From: kmasters9291888@yahoo.com
Subject: Fwd: Test
Date: Thu, 14 Jul 2016 19:58:58 -0400
To: kce_gibson76@hotmail.com

Kenneth Masters
919-360-4889

Sent from my iPhone

Begin forwarded message:

From: RL <roadman@gmail.com>
Date: July 12, 2016 at 07:53:54 EDT
To: Kenny Masters <kmasters9291888@yahoo.com>
Subject: Re: Test
Reply-To: roadman@gmail.com

Hey man please send me the following
1. All recruiting letters and candidate questionnaire in word format
2. updated contact list for program members.

Thanks

On Thu, Jun 30, 2016 at 11:45 AM, RL <roadman@gmail.com> wrote:

Kenny,

Close hold between us please. Send me all recruiting documentation
that we currently use (all letters / questionnaire etc...)

Thanks man

On Tue, Jun 28, 2016 at 1:11 PM, Kenny Masters
<kmasters9291888@yahoo.com> wrote:

Got it

Kenneth Masters
919-360-4889

Sent from my iPhone

> On Jun 28, 2016, at 07:58, Randy Leonard
<roadman@gmail.com> wrote:

>

>

>

> Sent from my iPhone

Randy Leonard.

Randy Leonard.